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From: Labus, Brian [Labus@CCHD.ORG]
Sent: Monday, November 28, 2005 2:55 PM
To: qrulepubliccomments
Subject: Q Rule Comments

I am very happy with most of the changes that are proposed to 42 CFR Part 70, especially those requiring that airlines collect relevant data in a useful format that can quickly be shared with public health. From person experience, it has been frustrating to try and obtain this type of information, and these changes would significantly improve the ability to find people that have been exposed to communicable disease.

As an epidemiologist in a local health department, I do have concerns about the changes to 42 CFR Part 70.4, related to the reporting of illnesses by vessels and conveyances.

My first concern is that air carriers are the only conveyances that will be required to report illnesses under the proposed regulations. Although it is easier to implement a system that would only involve airlines, other conveyances should not be exempt from these regulations. SARS has been given as an example throughout CDC's announcement of the proposed changes. We had an experience in Las Vegas with SARS that was related to a tour bus, and not an airline. A large number of people had traveled with the exposed individual from San Francisco to Los Angeles, then to Las Vegas, then to the Grand Canyon and back to Las Vegas. Tour bus or train operators should be held to the same requirements as air carriers, as they just as easily transport infected people.

My other concern involves the method by which local health departments are notified. Under the current regulations, local health departments are the only public health agency that is notified. I can understand the desire to have reporting to the federal level through quarantine stations, as the CDC becomes involved in issues affecting more than one state; this addition is reasonable and would allow for better coordination of multi-jurisdictional problems. The new regulation also requires that the state health department, not the local health department, be notified. If a person with an infectious disease is arriving in Las Vegas in a matter of minutes or hours, potential delays in the notification of the local health department could make it impossible to respond effectively. My concern is that the CDC quarantine station, located in Los Angeles, and the state health division, located in Carson City (both of which are hundreds of miles away) cannot respond quickly enough, and that any delay in notification could result in a missed opportunity to prevent disease. I would like to see the proposed regulation modified so that the Director and the local health authority are notified. The local health authority would then have the responsibility of notifying the appropriate people at the state level.

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